

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and  
SAMSUNG ELECTRONICS AMERICA,  
INC.,

Defendants.

Case No. 2:23-cv-00103-JRG-RSP

**JURY TRIAL DEMANDED**

**JOINT MOTION TO DISMISS COUNT 3 OF PLAINTIFF'S AMENDED COMPLAINT**

Plaintiff Headwater Research LLC (“Headwater”) and Defendants Samsung Electronics Co., Ltd and Samsung Electronics America, Inc. (“Samsung”) (collectively, the “Parties”) hereby file this joint motion to dismiss, with prejudice, Count 3 of Headwater’s Amended Complaint (Dkt. 31), which asserts infringement of U.S. Patent No. 9,615,192 (“the ’192 patent”). In narrowing its case for trial, Headwater elected not to pursue its claims under the ’192 patent.

Accordingly, the Parties respectfully request dismissal with prejudice of Count 3 of Headwater’s Amended Complaint (Dkt. 31).

Date: April 29, 2025

Respectfully submitted,

By: /s/ Reza Mirzaie

By: /s/ Thad C. Kodish

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 29th day of April 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

*/s/ Reza Mirzaie*  
Reza Mirzaie

**CERTIFICATE OF CONFERENCE OF COUNSEL**

I hereby certify that counsel of record for Headwater and Defendants have met and conferred in compliance with Local CV-7(h). This is a joint motion.

*/s/ Reza Mirzaie*  
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